

**STATE OF IOWA  
BEFORE THE IOWA UTILITIES BOARD**

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IN RE:	)	
	)	
	)	DOCKET NO. RPU-2018-0003
MIDAMERICAN ENERGY COMPANY	)	
WIND XII PROPOSAL	)	
	)	
	)	

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**ENVIRONMENTAL INTERVENOR’S MOTION FOR CONFIDENTIAL TREATMENT**

Environmental Law & Policy Center and the Iowa Environmental Council (“Environmental Intervenors”) request that the redacted portions of Environmental Intervenors’ Post-Hearing Brief, filed here, be kept confidential by the Iowa Utilities Board (“IUB”), pursuant to Iowa Code § 22.7(3) and (6) and 199 Iowa Admin. Code §1.9(5) et seq. until MidAmerican Energy Company has time to file its own motion justifying the confidential treatment of this brief if necessary. The Confidential Post-Hearing Brief is being filed with the label “Confidential.” In accordance with the IUB’s rules, a public version of the brief is also being filed. In support of this motion, the Environmental Intervenors state as follows:

1. The Environmental Intervenors have entered a protective agreement with MidAmerican Energy Company to receive confidential information in this proceeding.
2. Environmental Intervenors understand that MidAmerican considers information in the Post-Hearing Brief to be confidential and deserving of protection of trade secret information as granted under Code of Iowa §22.7(3) and deserving of protection as a report to the Board which if released would give advantage to competitor and serve no public purpose.
3. The Environmental Intervenors’ request is based on MidAmerican’s confidential designation in providing a response to Environmental Intervenors’ data request.

Based on MidAmerican's designation of the information as confidential, Environmental Intervenors respectfully request the Board grant this Motion for Confidential Treatment of the Post-Hearing Brief at this time and provide MidAmerican Energy Company the opportunity to file its own motion to justify the continued confidential treatment of the brief.

DATED: October 29, 2018

Respectfully submitted,

/s/ Joshua T. Mandelbaum  
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